

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Western District of Texas

FILED

May 01, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Adriana Quezada
DEPUTYUnited States of America
v.Case No. **EP:25-MJ- 2086 -ATB**Uriel Rigoberto GAYTAN-Aldaco
*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.
On or about the date(s) of April 30, 2025 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:

Code Section

8 U.S.C. 1324 (a)(2)(B)(ii)

Offense Description

knowing and in reckless disregard of the fact that an alien has not received prior official authorization to come to, enter, or reside in the United States, brought to and attempted to bring to the United States in any manner whatsoever such alien, regardless of any official action which may later be taken with respect to such alien, for the purpose of commercial advantage and private financial gain.

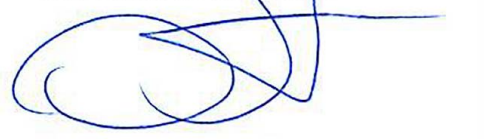
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.


Complainant's signature

Brenda A. Marrufo
CBP Enforcement Officer

Sworn to before me and signed in my presence.

Date: May 1, 2025City and state: El Paso, Texas

Judge's signature

Anne T. Berton

United States Magistrate Judge

Complaint sworn to telephonically on
May 01, 2025 at 01:08 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

FACTS

That on or about April 30, 2025, the DEFENDANT, Uriel Rigoberto GAYTAN-Aldaco, a citizen of Mexico, applied for admission at the Paso Del Norte Port of Entry in El Paso, Texas located in the Western District of Texas and was apprehended attempting to transport two Mexican nationals hidden in the trunk of his vehicle.

The DEFENDANT approached vehicle primary lane number nine (9) driving a Hyundai sedan bearing Mexico license plates and presenting his valid Lincoln Visa bearing his name, date of birth, and photograph to a Customs and Border Protection Officer (CBPO).

During the primary inspection, the DEFENDANT claimed ownership of the vehicle and stated he was heading to purchase some things for work in El Paso, Texas. The DEFENDANT stated he had nothing to declare. The CBPO noticed the DEFENDANT exhibit nervous behavior when asked to open the trunk of his vehicle. The DEFENDANT stated the trunk was broken and could not be opened. At that point, the CBPO referred the DEFENDANT and vehicle into secondary for further inspection.

In vehicle secondary, the DEFENDANT stated he was going to Walmart to buy spices and was coming from his home in Ciudad Juarez, Chihuahua, Mexico. The DEFENDANT further stated that he had been the owner of the vehicle for about two (2) years, had not done any type of repairs within the last 3 to 4 days, and that no one else had driven his vehicle. During a 7-point inspection of the vehicle, the trunk could not be inspected as the secondary officer noticed that the rear spoiler was bolted to the trunk and rear bumper of the vehicle. The vehicle was then inspected by an x-ray system which revealed anomalies in the trunk area. The vehicle was then inspected by a canine officer and his Concealed Human and Narcotics Detection Dog yielding a positive alert to the vehicle's interior. CBPOs discovered two individuals hidden inside the trunk of the vehicle. At that point, all occupants of the vehicle were escorted into a secure area.

During the post inspection interview, the CBPO asked the DEFENDANT where he was traveling, and the DEFENDANT freely stated he was heading to a park to drop off the two (2) individuals inside his trunk. At that point, the DEFENDANT was served with form I-214 Warning as to Rights (Spanish Version), which he read, understood, signed, and agreed to give a sworn statement without the benefit of counsel.

In a sworn statement, the DEFENDANT stated he was initially paid \$500 US Dollars and was to receive a total of \$1,500 US Dollars once he was successful in smuggling the two individuals inside the trunk of his vehicle. The DEFENDANT further admitted that he was aware the individuals did not have any legal documents to enter the United States and once entering the United States he was to drop them off at a park. In Passport Control Secondary (PCS) database records revealed the two individuals hidden inside the trunk of the vehicle were in fact Mexican nationals without any legal documents to enter the United States.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

CRIMINAL AND IMMIGRATION RECORD

CRIMINAL RECORD:

None.

IMMIGRATION RECORD:

Lincoln Non-Immigrant Visa holder